

For Six Month Period Ending JAN 31 2002  
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No. 05404

BRIAN M. BRUH  
(c) Business Address(es) of Registrant

BRIAN BRUH ASSOCIATES LLC  
9401 NOODEN BRIDGE ROAD  
POTOMAC, MD. 20854

2. Has there been a change in the information previously furnished in connection with the following:

- (a) If an individual:
- |                       |                              |  |
|-----------------------|------------------------------|--|
| (1) Residence address | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Citizenship       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Occupation        | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

- (b) If an organization:
- |                          |                              |  |
|--------------------------|------------------------------|--|
| (1) Name                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in items (a) and (b) above.

NO CHANGES

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐

No ☒

If yes, have you filed an amendment to the Exhibit C?

Yes ☐

No ☒

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (a waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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- (b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. (a) Has any person named in item 4(b) rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒ *N/A*

If yes, identify each such person and describe his service.

- (b) Have any employee or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated
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- (c) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes ☐ No ☒ *N/A*

If no, list names of persons who have not filed the required statement.

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

*Name of foreign principal*

*Date of termination*

8. Have you acquired any new foreign principal<sup>2</sup> during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

9. In addition to those named in Items 7 and 8, if any, list foreign principals<sup>2</sup> whom you continued to represent during the 6 month reporting period.

- 1) PRINCIPALITY OF LIECHTENSTEIN (GOVERNMENT)
- 2) INSTITUTE FOR COMPLIANCE & QUALITY MANAGEMENT IN  
SCHAAN, LIECHTENSTEIN

10. **EXHIBITS A AND B**

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A <sup>3</sup>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Exhibit B <sup>4</sup>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

## III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

PLEASE SEE COVER LETTER FOR DETAILS

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places, of delivery, names of speakers and subject matter.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> The term "political activities" means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government, a foreign country or a foreign political party.

## IV - FINANCIAL INFORMATION

## 14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies<sup>6</sup>

Date	From Whom	Purpose	Amount
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PLEASE SEE COVER LETTER FOR DETAILS

Total

## (b) RECEIPTS - FUND RAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fund raising campaign<sup>7</sup>, any money on behalf of any foreign principal named in items 7, 8, and 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

## (c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal	Date received	Description of thing of value	Purpose
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<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. (See Rule 201(e).)

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal.

<sup>9</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, and 9 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date

To Whom

Purpose

Amount

VARIOUS DATES OF TRAVEL TO AIA FROM LIECHTENSTEIN (COSTS INCURRED) + RELATED HOTEL AND MEAL EXPENSES,

As I previously reported it is the custom in LIECHTENSTEIN for one person to pay for the meals of others. EATING NORMALLY, OR RATHER USUALLY MY MEALS WERE PAID BY ONE GOVERNMENT OFFICIAL OR ANOTHER AIA ON A FEW OCCASIONS I PAID THE BILL, REGARDLESS HOWEVER THE GOVERNMENT OF LIECHTENSTEIN WAS BILLED FOR THE EXPENSES.

OTHER THAN COSTS FOR SUCH ITEMS AS LONG DISTANCE TELEPHONE CALLS & POSTAGE FOR ROUTINE CORRESPONDENCE, I HAD NO OTHER COSTS (EXPENSES),

Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, and 9 of this statement?

Yes ☐No ☐

If yes, furnish the following information:

Date disposed	Name of person to whom given	On behalf of what foreign principal	Description of thing of value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐No ☐

If yes, furnish the following information:

Date	Amount or thing of value	Name of political organization	Name of candidate
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10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

**V - INFORMATIONAL MATERIALS**

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials<sup>12</sup>?  
 Yes ☐ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN SECTION V.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Magazine or newspaper articles | <input type="checkbox"/> Motion picture films            | <input type="checkbox"/> Letters or telegrams |
| <input type="checkbox"/> Advertising campaigns  | <input type="checkbox"/> Press releases                 | <input type="checkbox"/> Pamphlets or other publications | <input type="checkbox"/> Lectures or speeches |
| <input type="checkbox"/> Other (specify) _____  |   |  |   |

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Public Officials      | <input type="checkbox"/> Newspapers                   | <input type="checkbox"/> Libraries                |
| <input type="checkbox"/> Legislators           | <input type="checkbox"/> Editors                      | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies   | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups       |
| <input type="checkbox"/> Other (specify) _____ |   |   |

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



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**VI--EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

2-23-02(Type or print name under each signature<sup>13</sup>)Brian M. BrumBRIAN M. BRUM

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**UNITED STATES DEPARTMENT OF JUSTICE  
FARA REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D.C. 20530**

**NOTICE**

Please answer the following questions and return this sheet in triplicate with your Supplemental Statement:

1. Is your answer to Item 16 of Section V (Informational Materials - page 8 of Form CRM-154, formerly Form OBD-64-Supplemental Statement):

YES \_\_\_\_\_ or NO NO

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

YES \_\_\_\_\_ or NO NO

(If your answer to question 2 is "yes" please forward for our review copies of all material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

  
Signature

2-23-02  
Date

Brian M. Bevilacqua  
Please type or print name of  
signatory on the line above

Registrant  
Title

2002 FEB 25 PM 4:40

**Brian Bruh Associates LLC**

9401 Wooden Bridge Road  
Potomac, Maryland 20854  
(301) 424-9111 (301) 424-6111 (fax)  
brianbruhasociates@att.net

**February 23, 2002**

**Registration Unit  
Internal Security Section, Criminal Division  
US Department of Justice  
Washington, DC 20530**

**Dear Sir or Madam,**

**In re: Registration # 05404**

**Enclosed is my six-month report for my work with the Government of Liechtenstein and the Institute for Compliance & Quality Management (ICQM) in Liechtenstein. Enclosed also is my check for \$610 for the registration fees covering my work with the government of Liechtenstein and the Institute for Compliance and Quality Management (ICQM). My work for the government of Liechtenstein effectively ended at the end of January 2002, although the official termination date is March 15, 2002.**

**Government of Liechtenstein**

**My consulting service to the Liechtenstein was to assist in a number of ways toward the goal of that government being removed from the FATF list of Non Cooperative Countries & Territories (NCCT). These duties included my advising that government on new laws, regulations and organizations that would better the Liechtenstein's government's efforts toward fighting money laundering and international crime. My efforts also included consulting with the Liechtenstein's Prosecutor's Office, the private financial and legal communities and the Royal family, again all in furtherance of Liechtenstein being removed from the FATF's NCCT List. It also required me to have discussions with the US Department of Justice as I reported earlier. These discussions were as much DOJ initiated as they may have been by me. DOJ's desire was to have Liechtenstein meet the FATF standards and mine was the same as a consultant to Liechtenstein.**

**In June 2001, the FATF, after receiving progress reports and conducting their own review removed the Government of Liechtenstein from the FATF NCCT list. A January, 2002 review and a February FATF vote again decided that Liechtenstein would not be placed again on the NCCT list despite some deficiencies because sufficient progress was made. The FATF announced that they would do further follow-up.**

**As a result of the aforementioned and as a practical matter my consulting services for the Government of Liechtenstein is no longer required. My service will officially come to an end on March 15, 2002 but I anticipate that I will do no further work on their behalf that**

would meet the need to be further registered. Therefore, I respectfully request that this my termination notice to the Department of Justice with respect to my registration for performing any kind of service on behalf of the government of Liechtenstein that would require me to register as an agent.

I respectfully further request that you remove me from any list that would further show me to be a current agent for the government of Liechtenstein. Should the arrangement change whereby I would be engaging in any kind of service to the government of Liechtenstein that would require me to again register, I will in fact do that.

**Institute for Compliance & Quality Management (ICQM)**

During the past reporting period, my services were rather brief in nature. They included my as Chairman holding the Board of Director's Meeting in November 2001 in Liechtenstein and discussing relevant issues with members and potential members as well as with the ICQM staff. No US entities were contacted for membership or any other reasons by me or under my direction. At the request of a United Kingdom citizen I did brief two officials of the UK's Custom Service Anti Money laundering Unit and a member of the UK Parliament about the purpose of the ICQM and how it carries out its functions. No requests were made of them.

**Supplemental Statement    Item 14(a)   Receipts – Monies**

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
8/31/01	Gov't of Liechtenstein	Consulting fees & expenses	\$ 7,945
9/26/01	Gov't of Liechtenstein	Consulting fees & expenses	29,714
10/5/01	Gov't of Liechtenstein	Consulting fees & expenses	49,225
11/26/01	Gov't of Liechtenstein	Consulting fees & expenses	26,283
11/26/01	Gov't of Liechtenstein	Consulting fees & expenses	29,932.
8/6/01	ICQM	Board Director fees & exp.	11,579.20
10/10/01	ICQM	Board Director fees & exp.	34,269.49
10/10/01	ICQM	Board Director fees & exp.	12,273.79
11/27/01	ICQM	Board Director fees & exp.	29,213.80
2/19/02	ICQM	Board Director fees & exp.	<u>11,596.03</u>
		Total	\$242,004.31

Again, absent receiving instructions from your office, I intend for this report to be my final one with respect to my work for the government of Liechtenstein, therefore, in the interest of full disclosure, indicated below are amounts billed to that government which as of yet have not been paid:

<u>Billing Period</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
10/01	Gov't of Liechtenstein	Consulting fees & expenses	\$44,770
11/01	Gov't of Liechtenstein	Consulting fees & expenses	41,845
12/01	Gov't of Liechtenstein	Consulting fees & expenses	21,355
Jan/02	Gov't of Liechtenstein	Consulting fees & expenses	33,890
		Total Billed & Outstanding	\$141,860

Please let me know if you have any questions.

Sincerely yours,



Brian M. Bruh

Encl: Completed original plus 2 copies of Supplemental Statement  
Check for \$610.

2002 FEB 25 PM 4:40